

Dear Sirs.

My company provides wireless networking services for local and national companies. Our services have been deployed in a wide range of areas. Specifically, we design wireless networks for WISPs in rural communities. These areas are sparsely populated and densely covered in foliage. In some areas the customers are just too far away for DSL and not populated enough to attract the cable companies to bring cable modems. With the advances in technology and the explosion of the Internet the world has shrunk and everyone is a little closer. The only people that can fully appreciate this phenomenon are the people with access to that world. Although dial-up is readily available, it does not provide the high-speed access required to fully take advantage of the information that is available. Enter the Wireless ISP. In these communities it is the local neighbor that is granting access to a treasure trove of knowledge. These small companies are usually run by a small group of people sometimes as few as two. They start the WISP, because they are fed up with dial-up and figure if they can get a T1 line run to town they can split it up with their neighbors. It is a community thing. The rural communities should be given the tools necessary to make it easier to deploy their service.

The networks we design typically use 2.4GHz radios for the end users and 5.8GHz radios for business customers and backhauls. In deploying these networks our greatest obstacle is the tree. The addition of lower frequencies, sub 900 MHz, would allow us to punch through the foliage and penetrate a desperate market pleading for anything faster than the 56 kbps they are currently using. Our clients receive calls every day from potential customers that they just cannot reach. There are several companies now looking to 900MHz radios as an answer. This is absolutely a step in the right direction. I believe that hardware manufacturers will jump on the chance to provide radios at an unlicensed 700MHz band. This will provide a wide range of frequencies and options for the WISP to offer service to a greater percentage of the population. Especially, if the 700MHz was allowed a higher transmit power. Thus, allowing the rural communities to enjoy the Internet with the rest of the world.

In the more populated areas where ambient RF is more prevalent the addition of a higher band like the 3.6GHz – 3.7GHz would give additional spectrum for less congested traffic. It is important to note that this additional spectrum should be reserved for data traffic. Give the space to the WISP so they can expand their markets and extend the reach of each tower. These additional frequencies will give WISPs a better opportunity to grow. It will give them options and instead of blindly stepping on competitors they have more options for working with them.

By adding more spectrum you will also create a very positive chain of events. More spectrum will introduce the need for new radios. This will create new manufacturing companies and new jobs that will help the economy to drive forward. New companies means more options for service which will bring the world even closer to these rural communities. You are giving the WISPs the opportunity to reach more people allowing them to increase sales and provide more jobs.

Permitting the rural communities better access to information and knowledge enjoyed by others. This promotes better education, which promotes better jobs, also helping the economy.

My only caution would be to limit the rules in these areas as far as access methods and such. Set power levels (hopefully a little higher) and channel width and let the rest fall on the shoulders of the manufacturer. Let the ingenuity of the American people come up with their own way of accessing the frequencies.

I am grateful that the Commission is exploring new ways to improve the access to other frequencies. With the single act of allowing more available channels to the wireless industry you are giving a great boost to the economy and helping the small business owner who just wants to make the world a smaller place.

Thank you for the opportunity to share my ideas.

Samuel D. Coyle
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